

# Exhibit 4

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

Civil Action No. 2:13-cv-193 (NGR)

RICK PERRY, *et al.*,

Defendants.

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS  
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC  
COUNTY JUDGES AND COUNTY  
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

Civil Action No. 2:13-cv-263 (NGR)

STATE OF TEXAS, *et al.*,

Defendants.

TRUE THE VOTE,

Movant-Intervenor.

TEXAS STATE CONFERENCE OF NAACP  
BRANCHES, *et al.*,

Plaintiffs,

v.

JOHN STEEN, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

**PLAINTIFF UNITED STATES' INITIAL DISCLOSURES**

Pursuant to Federal Rule of Civil Procedure 26(a)(1), Plaintiff United States respectfully submits, through undersigned counsel, these initial disclosures. The disclosures are based on information and documents that are presently available or specifically known to the United States. It is anticipated that further discovery and investigation may reveal additional witnesses, information, or documents. The United States reserves the right to rely on such additional discovery and investigations, and to supplement its disclosures as warranted thereby. The disclosures are made in a good faith effort to supply as much information and specification as is presently known, but shall not prejudice the United States in relation to further discovery and investigations. The disclosures are organized below by reference to the categories set forth in Federal Rule 26(a)(1)(i)-(iv).

*Rule 26(a)(1)(A)(i): The name and, if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.*

1. Amanda Arriaga, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Ms. Arriaga will likely have discoverable information regarding the Texas Department of Public Safety and the implementation of SB 14.

2. James Abshier, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor Austin, TX 78701. (512) 936-1307. Mr. Abshier will likely have discoverable information regarding the burden of SB 14 on voters who do not possess an acceptable form of photo ID. *See* Oral Dep. of Mr. James Abshier (June 15, 2012), *Texas v. Holder*, No. 1:12-cv-128 (D.D.C. 2012).
3. Jose Aliseda, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Former Representative Aliseda will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; and the lack of responsiveness to the particularized needs of the minority community. *See* Oral Dep. of Representative Jose Aliseda (June 6, 2012), *Texas v. Holder*, No. 1:12-cv-128; Trial Tr. 123-153 (July 9, 2012 am) (Aliseda), Trial Tr. 5-31 (July 9, 2012 pm) (Aliseda), *Texas v. Holder*, No. 1:12-cv-128.
4. Representative Rafael Anchia, Room E1.408, Capitol Extension P.O. Box 2910 Austin, TX 78768. (512) 463-7046. Representative Anchia will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; and the lack of responsiveness to the particularized needs of the minority community. *See* Oral Dep. Mr. Anchia (June 6, 2012), *Texas v. Holder*, No. 1:12-cv-128 (D.D.C. 2012); Trial Tr. 20-48 (July 10, 2012 pm) (Anchia), *Texas v. Holder*, No. 1:12-cv-128.
5. Hope Andrade, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor Austin, TX 78701. (512) 936-1307. Former Secretary of State Andrade will likely have discoverable information regarding the history, development, enactment, and implementation of SB 14, and the tenuousness of the legislature's purported justifications for photographic voter identification legislation;
6. Kenneth Armbrister, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Senator Armbrister will likely have discoverable information regarding the history, development, enactment, plans for implementation and implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; and the lack of responsiveness to the particularized needs of the minority community. *See* Oral Dep. of Senator Kenneth Armbrister (June 8, 2012), *Texas v. Holder*, No. 1:12-cv-128.
7. Frank Battle, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Mr. Battle will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; and the lack of responsiveness to the particularized needs of the minority community.

8. Colby Beuck, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Mr. Beuck will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; and the lack of responsiveness to the particularized needs of the minority community. *See* Oral Dep. of Mr. Colby Beuck (May 14, 2012), *Texas v. Holder*, No. 1:12-cv-128.
9. Representative Dennis Bonnen, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Representative Bonnen will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; and the lack of responsiveness to the particularized needs of the minority community. *See* Oral Dep. of Representative Dennis Bonnen (June 6, 2012), *Texas v. Holder*, No. 1:12-cv-128.
10. Jeff Boyd, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Mr. Boyd will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14.
11. Walter Brandt, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Mr. Brandt will likely have discoverable information regarding Department of Public Safety databases. *See* Oral Dep. of Mr. Walter Brandt (June 19, 2012), *Texas v. Holder*, No. 1:12-cv-128.
12. Blaine Brunson, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Mr. Brunson will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; and the lack of responsiveness to the particularized needs of the minority community. *See* Oral Dep. of Mr. Blaine Brunson (May 30, 2012), *Texas v. Holder*, No. 1:12-cv-128.
13. Rebecca Davio, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Ms. Davio will likely have discoverable information regarding the Texas Department of Public Safety and the implementation of SB 14. *See* Oral Dep. of Ms. Rebecca Davio (June 15, 2012), *Texas v. Holder*, No. 1:12-cv-128.
14. Denise Davis, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor Austin, TX 78701. (512) 936-1307. Ms. Davis will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of legislature's purported justifications for photographic voter identification legislation; and the lack of responsiveness to the particularized needs of the

minority community. *See* Oral Dep. of Ms. Denise Davis (June 14, 2012), *Texas v. Holder*, No. 1:12-cv-128.

15. Karina Davis, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor Austin, TX 78701. (512) 936-1307. Ms. Davis will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; and the lack of responsiveness to the particularized needs of the minority community. *See* Oral Dep. of Ms. Karina Davis (June 15, 2012), *Texas v. Holder*, No. 1:12-cv-128.
16. Senator Wendy Davis, P.O. Box 12068, Capitol Station, Austin, TX 12068. (512) 463-0110. Senator Davis will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; and the lack of responsiveness to the particularized needs of the minority community. *See* Oral Dep. of Senator Wendy Davis (June 6, 2012), *Texas v. Holder*, No. 1:12-cv-128; Trial Tr. 14-38 (July 12, 2012 am) (Davis), *Texas v. Holder*, No. 1:12-cv-128.
17. Lieutenant Governor David Dewhurst, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor Austin, TX 78701. (512) 936-1307. Lieutenant Governor Dewhurst will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; the lack of responsiveness to the particularized needs of the minority community; and racial appeals in political campaigns.
18. Senator Robert Duncan, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Senator Duncan will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; and the lack of responsiveness to the particularized needs of the minority community. *See* Oral Dep. of Senator Robert Duncan (June 7, 2012), *Texas v. Holder*, No. 1:12-cv-128.
19. Tammy Edgerly, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Ms. Edgerly will likely have discoverable information regarding the history, development, and enactment of SB 14.
20. David Eichler, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Mr. Eichler will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14.

21. Senator Rodney G. Ellis, PO Box 12068, Capitol Station, Austin, TX 78711. (512) 463-0113. Senator Ellis will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; and the lack of responsiveness to the particularized needs of the minority community. *See* Oral Dep. Senator Rodney G. Ellis (June 22, 2012), *Texas v. Holder*, No. 1:12-cv-128; Trial Tr. 9-53 (July 11, 2012 pm) (Ellis), *Texas v. Holder*, No. 1:12-cv-128.
22. Carey Eskridge, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Ms. Eskridge will likely have discoverable information regarding the history, development, and enactment of SB 14.
23. Meredyth Fowler, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701, (512) 936-1307. Ms. Fowler will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; and the lack of responsiveness to the particularized needs of the minority community. *See* Oral Dep. of Ms. Meredyth Fowler (June 8, 2012), *Texas v. Holder*, No. 1:12-cv-128.
24. Senator Troy Fraser, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Senator Fraser will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; the lack of responsiveness to the particularized needs of the minority community; and racial appeals in political campaigns. *See* Oral Deps. of Senator Troy Fraser (May 17 and June 13, 2012), *Texas v. Holder*, No. 1:12-cv-128.
25. Representative May Giddings, Capitol Office, Room GW.11 P.O. Box 2910 Austin, TX 78768. (512) 463-0953. Ms. Giddings will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; and the lack of responsiveness to the particularized needs of the minority community. *See* Oral Dep. of Representative May Giddings (June 6, 2012), *Texas v. Holder*, No. 1:12-cv-128.
26. Representative Larry Gonzales, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Representative Gonzales will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; and the lack of responsiveness to the particularized needs of the minority community. *See* Oral Dep. of Representative Larry Gonzales (May 31, 2012), *Texas v. Holder*, No. 1:12-cv-128.

27. Lee Guyette, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Mr. Guyette will likely have discoverable information regarding Texas's statewide voter registration database. *See* Oral Dep. of Lee Guyette (June 19, 2012), *Texas v. Holder*, No. 1:12-cv-128.
28. David Hanna, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Mr. Hanna will likely have discoverable information regarding the history, development, and enactment of SB 14.
29. Representative Patricia Harless, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Representative Harless will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; the lack of responsiveness to the particularized needs of the minority community; and racial appeals in political campaigns. *See* Oral Deps. of Representative Patricia Harless (May 15 and June 13, 2012), *Texas v. Holder*, No. 1:12-cv-128.
30. Brian Hebert, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor Austin, TX 78701. (512) 936-1307. Mr. Hebert will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; and the lack of responsiveness to the particularized needs of the minority community. *See* Oral Dep. of Mr. Brian Hebert (May 29, 2012), *Texas v. Holder*, No. 1:12-cv-128.
31. Keith Ingram, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor Austin, TX 78701. (512) 936-1307. Mr. Ingram will likely have discoverable information regarding plans to implement and the implementation of SB 14 and the tenuousness of the legislature's purported justifications for photographic voter identification legislation;. *See* Oral Dep. of Mr. Keith Ingram (June 5, 2012), *Texas v. Holder*, No. 1:12-cv-128; Trial Tr. 5-28, 45-123 (July 9, 2012 am) (Ingram), *Texas v. Holder*, No. 1:12-cv-128.
32. Jennifer Jackson, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Ms. Jackson will likely have discoverable information regarding the history, development, and enactment of SB 14.
33. Cherry L. Johnson-Lawson, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor Austin, TX 78701. (512) 936-1307. Ms. Johnson-Lawson will likely have discoverable information regarding Department of Public Safety databases. *See* Oral Dep. of Ms. Cherry L. Johnson-Lawson (Apr.17, 2012), *Texas v. Holder*, No. 1:12-cv-128.

34. Dennis Leopold, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor Austin, TX 78701. (512) 936-1307. Mr. Leopold will likely have discoverable information regarding Department of Public Safety databases. *See* Oral Dep. of Mr. Dennis Leopold (June 19, 2012), *Texas v. Holder*, No. 1:12-cv-128.
35. Germaine Mary Martinez, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor Austin, TX 78701. (512) 936-1307. Ms. Martinez will likely have discoverable information regarding Department of Public Safety databases. *See* Oral Dep. of Ms. Germaine Mary Martinez (Apr. 17, 2012), *Texas v. Holder*, No. 1:12-cv-128.
36. Gloria Martinez, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Ms. Martinez will likely have discoverable information regarding Department of Public Safety databases. *See* Oral Dep. of Ms. Gloria Martinez (Apr. 17, 2012), *Texas v. Holder*, No. 1:12-cv-128.
37. Representative Trey Martinez-Fischer, Room 4S.04, Capitol, P.O. Box 2910 Austin, TX 78768. (512) 463-0616. Representative Martinez-Fischer will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; and the lack of responsiveness to the particularized needs of the minority community. *See* Oral Dep. Mr. Martinez-Fischer (June 15, 2012), *Texas v. Holder*, No. 1:12-cv-128; Trial Tr. 111-141 (July 10, 2012 am), 5-14 (July 10, 2012 pm) (Martinez-Fischer), *Texas v. Holder*, No. 1:12-cv-128.
38. Brandy Marty, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Ms. Marty will likely have discoverable information regarding the history, development, enactment, plans for implementation, and implementation of SB 14, and the tenuousness of the legislature's purported justifications for photographic voter identification legislation.
39. Royal Masset, 6108 Back Bay Lane Austin, TX 78739. (512) 288-5728. Mr. Masset will likely have discoverable information regarding the impact of SB 14.
40. Janice McCoy, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Ms. McCoy will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; and the lack of responsiveness to the particularized needs of the minority community. *See* Oral Dep. of Ms. Janice McCoy (May 16, 2012), *Texas v. Holder*, No. 1:12-cv-128.
41. Steve McCraw, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Mr. McCraw will likely have discoverable information regarding the implementation of SB 14.

42. Ann McGeehan, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Ms. McGeehan will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14, and the tenuousness of the legislature's purported justifications for photographic voter identification legislation. *See* Oral Dep. of Ann McGeehan (May 31, 2012), *Texas v. Holder*, No. 1:12-cv-128.
43. Forrest Mitchell, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Mr. Mitchell will likely have discoverable information regarding the tenuousness of the legislature's purported justifications for photographic voter identification legislation. *See* Oral Dep. of Mr. Forrest Mitchell (June 15, 2012), *Texas v. Holder*, No. 1:12-cv-128; Trial Tr. 33-69 (July 9, 2012 pm) (Mitchell), *Texas v. Holder*, No. 1:12-cv-128.
44. Liz Morris, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Ms. Morris will likely have discoverable information regarding the history, development, and enactment of SB 14.
45. Richard Parsons, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Mr. Parsons will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14. *See* Oral Dep. of Richard Parsons (June 14, 2012), *Texas v. Holder*, No. 1:12-cv-128.
46. Senator Dan Patrick, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Senator Patrick will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; and the lack of responsiveness to the particularized needs of the minority community. *See* Oral Dep. of Senator Dan Patrick (May 30, 2012), *Texas v. Holder*, No. 1:12-cv-128.
47. Representative Aaron Peña, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Representative Peña will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; and the lack of responsiveness to the particularized needs of the minority community. *See* Oral Dep. of Representative Aaron Peña (June 1, 2012), *Texas v. Holder*, No. 1:12-cv-128.
48. Anne Peters, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Ms. Peters will likely have discoverable information regarding the history, development, and enactment of SB 14.

49. Julia Rathgeber, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Ms. Rathgeber will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; and the lack of responsiveness to the particularized needs of the minority community. *See Oral Dep. of Ms. Julia Rathgeber (May 29, 2012), Texas v. Holder, No. 1:12-cv-128.*
50. Representative Debbie Riddle, Office of the Attorney General of Texas, 209 W. 14th Street, 8th Floor, Austin, TX 78701. (512) 936-1307. Representative Riddle will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; the lack of responsiveness to the minority community; and racial appeals in political campaigns. *See Oral Dep. of Representative Debbie Riddle (May 31, 2012), Texas v. Holder, No. 1:12-cv-128.*
51. Leticia Salazar, Office of the Attorney General of Texas, 209 W. 14th Street, 8th Floor Austin, TX 78701. (512) 936-1307. Ms. Salazar will likely have discoverable information regarding the implementation of SB 14. *See Oral Dep. of Ms. Leticia Salazar (June 14, 2012), Texas v. Holder, No. 1:12-cv-128.*
52. Michael Schofield, Office of the Attorney General of Texas, 209 W. 14th Street, 8th Floor, Austin, TX 78701. (512) 936-1307. Mr. Schofield will likely have discoverable information regarding the history, development, enactment, plans for implementation, and the implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; and the lack of responsiveness to the particularized needs of the minority community. *See Oral Dep. of Mr. Michael Schofield (June 1, 2012), Texas v. Holder, No. 1:12-cv-128.*
53. John Seperhi, Office of the Attorney General of Texas, 209 W. 14th Street, 8th Floor, Austin, TX 78701. (512) 936-1307. Mr. Seperhi will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14, and the tenuousness of the legislature's purported justifications for photographic voter identification legislation.
54. Coby Shorter, Office of the Attorney General of Texas, 209 W. 14th Street, 8th Floor, Austin, TX 78701. (512) 936-1307. Mr. Shorter will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14, and the tenuousness of the legislature's purported justifications for photographic voter identification legislation;.
55. Todd Smith, Office of the Attorney General of Texas, 209 W. 14th Street, 8th Floor, Austin, TX 78701. (512) 936-1307. Mr. Smith will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter

identification legislation; and the lack of responsiveness to the particularized needs of the minority community. *See* Oral Dep. of Todd Smith (June 1, 2012), *Texas v. Holder*, No. 1:12-cv-128.

56. John Steen, Office of the Attorney General of Texas, 209 W. 14th Street, 8th Floor, Austin, TX 78701. (512) 936-1307. Secretary of State Steen will likely have discoverable information regarding the implementation of SB 14.
57. Representative Joe Straus, Office of the Attorney General of Texas, 209 W. 14th Street, 8th Floor, Austin, TX 78701. (512) 936-1307. Representative Straus will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; and the lack of responsiveness to the particularized needs of the minority community. *See* Oral Dep. of Representative Joe Straus (June 11, 2012), *Texas v. Holder*, No. 1:12-cv-128.
58. Ray Sullivan, Office of the Attorney General of Texas, 209 W. 14th Street, 8th Floor, Austin, TX 78701. (512) 936-1307. Mr. Sullivan will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; and the lack of responsiveness to the particularized needs of the minority community.
59. Senator Carlos Uresti, P.O. Box 12068, Capitol Station Austin, Texas 78711. (512) 463-0119. Senator Uresti will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of legislature's purported justifications for photographic voter identification legislation; and the lack of responsiveness to the particularized needs of the minority community. *See* Trial Tr. 132-43 (July 11, 2012 pm) (Uresti); Trial Tr. 4-14 (July 12, 2012 am) (Uresti), *Texas v. Holder*, No. 1:12-cv-128.
60. Senator Leticia Van de Putte, P.O. Box 12068, Capitol Station, Austin, TX 78711. (512)463-0126. Senator Van de Putte will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; and the lack of responsiveness to the particularized needs of the minority community.
61. Congressman Mark Veasey. c/o Chad Dunn, Brazil and Dunn, 4201 Cypress Creek Parkway, Suite 530, Houston, TX, 77068. (281) 580-6310. Congressman Veasey will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; and the lack of

responsiveness to the particularized needs of the minority community. *See* Oral Dep. of Mr. Mark Veasey (June 7, 2012), *Texas v. Holder*, No. 1:12-cv-128.

62. Kathy Walt, Office of the Attorney General of Texas, 209 W. 14th Street 8th Floor, Austin, TX 78701. (512) 936-1307. Ms. Walt will likely have discoverable information regarding the history, development, enactment, plans for implementation and the implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; and the lack of responsiveness to the particularized needs of the minority community.
63. Senator Tommy Williams, Office of the Attorney General of Texas, 209 W. 14th Street, 8th Floor, Austin, TX 78701. (512) 936-1307. Senator Williams will likely have discoverable information regarding the history, development, enactment, and plans for implementation of SB 14; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; and the lack of responsiveness to the particularized needs of the minority community. *See* Oral Dep. of Senator Tommy Williams (June 1, 2012), *Texas v. Holder*, No. 1:12-cv-128; Trial Tr. 69-135 (July 9, 2012 pm) (Williams), *Texas v. Holder*, No. 1:12-cv-128.
64. Elizabeth Winn, Travis County Attorney's Office, 314 West 11th Street, Austin, TX 78701. (512) 854-9415. Former Interim Director of Elections Winn will likely have discoverable information regarding the history, development, enactment, and implementation of SB 14, and the tenuousness of the legislature's purported justifications for photographic voter identification legislation;
65. Officials, employees, agents, and counsel of the United States Department of Defense, Department of Homeland Security, Department of State, Department of Veterans' Affairs, and Social Security Administration. These individuals will likely have discoverable information regarding forms of identification required by SB 14 and voters exempted from the photographic voter identification requirements of SB 14.
66. Current and former officials, employees, agents, and counsel of the State of Texas, including but not limited to the Office of the Texas Secretary of State, the Texas Division of Elections, the Texas Department of Public Safety, and other state agencies responsible for issuing identification. These individuals will likely have discoverable information regarding:
  - (a) procedures and costs associated with obtaining identification necessary to obtain acceptable photographic voter identification under SB 14;
  - (b) the history, development, enactment, and implementation of SB 14;
  - (c) the number of persons, including minorities, who lack a driver license or personal identification card issued by the State of Texas; or
  - (d) procedures and costs associated with obtaining an Election Identification Certificate.

67. Current and former Texas county election officials and employees. These individuals will likely have discoverable information regarding the administration of elections in Texas, including the administration of SB 14.
68. Persons who testified in the legislative proceedings related to SB 14. These individuals will likely have discoverable information regarding the history, development, enactment, plans for implementation, and possible effects of SB 14.
69. Current and former Texas state legislators and legislative staff who participated in any legislative session between the 79<sup>th</sup> to the 83<sup>rd</sup> legislative sessions, not otherwise disclosed. These legislators and staff will likely have discoverable information regarding the history, development, enactment, plans for implementation and possible effects of SB 14 and other proposed photographic voter identification legislation;
70. Persons identified in initial disclosures, supplements thereof, and discovery responses served by any party in *Texas v. Holder*, No. 1:12-cv-128 (D.D.C. 2012). These individuals will likely have discoverable information regarding the history, development, enactment, plans for implementation and possible effects of SB 14.

*Rule 26(a)(1)(A)(ii): A copy — or a description by category and location — of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.*

1. Documents, including but not limited to those produced in *Texas v. Holder*, No. 1:12-cv-128 (D.D.C. 2012), that relate to the history, development, enactment, and plans for implementation of SB 14; effect of SB 14 on Hispanic and African-American voters; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; the lack of responsiveness to the particularized needs of the minority community; or racial appeals in political campaigns. *See USA\_00000001 to USA\_00014882.*
2. Documents that relate to legislative history of SB 14. *See USA\_00014883 to USA\_00023915*
3. Data produced by the U.S. Census Bureau. *See USA\_00023916 to USA\_00024229.*
4. Senate Rules from the Regular Sessions of the 66<sup>th</sup>-79<sup>th</sup> Texas Legislatures (1979-2005). *See USA\_00024230 to USA\_00025822.*
5. Copies of deposition transcripts and exhibits from *Texas v. Holder*, No. 1:12-cv-128 (D.D.C. 2012). *See USA\_00025823 to USA\_00054089.*

6. Copies of trial transcripts from *Texas v. Holder*, No. 1:12-cv-128 (D.D.C. 2012). *See USA\_00054090 to USA\_00055634.*
7. Copies of comments to the Attorney General concerning the Attorney General's administrative review of SB 14 pursuant to Section 5 of the Voting Rights Act, 42 U.S.C. § 1973c not previously identified or produced in *Texas v. Holder*, No. 1:12-cv-128 (D.D.C. 2012). *See USA\_00055635 to USA\_00055682.*
8. Attorney General's determination letters relating to submissions for preclearance under Section 5 of the Voting Rights Act. *See USA\_00055683 to USA\_00055705.*
9. Documents related to consent decrees, court orders, and settlement agreements. *See USA\_00055706 to USA\_00056128.*

If any defendant wishes to review the identified, non-privileged documents set forth above, the defendant may contact the undersigned to request these documents. The United States will produce identified, non-privileged materials upon entry of a protective order to protect confidential and sensitive information

*Rule 26(a)(1)(A)(iii): A computation of each category of damages claimed by the disclosing party — who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.*

Not applicable.

*Rule 26(a)(1)(iv): For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.*

Not applicable.

Date: November 21, 2013

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 21, 2013, I served a true and correct copy of the foregoing via electronic mail on the following counsel of record:

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